

EXHIBIT L

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CASEY
KIRSCHNER; ALLCORE DEVELOPMENT
LLC; FINBRIT HOLDINGS LLC;
CHESHIRE VENTURES LLC; CARLETON
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader
Plaintiff / Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
BW HOLDINGS; LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.,

Interpleader Defendants /
Interpleader Counter-Plaintiffs.

**AMAZON.COM, INC.'S AND AMAZON DATA SERVICES, INC.'S
OBJECTIONS AND RESPONSES TO CARLETON NELSON AND CHESHIRE
VENTURES LLC's FIRST SET OF REQUESTS FOR PRODUCTION**

Objections and Response to Request for Production No. 2:

Amazon refers to and incorporates by reference its General Objections, Objections to Definitions, and Objections to Instructions, as though fully set forth in this Response. Amazon further objects to this Request to the extent that it calls for the production of documents or information protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or other applicable privileges, or for the production of confidential documents or information, including but not limited to the confidential information of other persons or entities. Amazon also objects to this Request to the extent it purports to require the production of documents that are already in the possession, custody, or control of Defendants, or available from sources to which Defendants also have access. In addition, Amazon objects to this Request to the extent that it seeks information that is unreasonably cumulative or duplicative.

Subject to and without waiving the foregoing objections, Amazon responds as follows: All relevant audio recordings of which Amazon is aware are already in the case record and Amazon is not aware of any video recordings that would be responsive to this Request. Amazon will conduct a reasonable search and produce any additional responsive, non-privileged documents in its possession, custody, or control.

Request for Production No. 3:

ALL DOCUMENTS RELATING TO LEASE TRANSACTIONS, including but not limited to (a) “guaranteed maximum price” budgets; (b) yields; (c) leasing, development, and other “soft” costs; (d) executed lease agreements and any amendments, extensions, or renewals; (e) agreements with any commercial real estate brokers (including but not limited to KBC ADVISORS) evidencing any rebate, credit, refund, or kickback to YOU from broker commissions.

Objections and Response to Request for Production No. 3:

Amazon refers to and incorporates by reference its General Objections, Objections to Definitions, and Objections to Instructions, as though fully set forth in this Response. Amazon further objects to this Request to the extent that it is vague and ambiguous, particularly in its use of the terms “guaranteed maximum price,” “yields,” “soft costs,” and “rebate, credit, refund, or kickback.” Amazon further objects to this Request on the grounds that it is unduly burdensome and overly broad and to the extent that it seeks information that is duplicative and cumulative. Amazon also objects to this Request to the extent it purports to require the production of documents that are already in the possession, custody, or control of Defendants, or available from sources to which Defendants also have access. Amazon further objects to this Request to the extent that it calls for the production of documents or information protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or other applicable privileges, or for the production of confidential documents or information, including but not limited to the confidential information of other persons or entities.

Subject to and without waiving the foregoing objections, Amazon offers to meet and confer with Defendants’ counsel to discuss a more reasonable scope for this Request. Amazon will conduct a reasonable search and produce responsive, non-privileged documents in its possession, custody, or control once a more reasonable scope for this Request has been agreed upon.

Request for Production No. 4:

All DOCUMENTS evidencing any procurement policies, processes, or procedures applicable to LEASE TRANSACTIONS or land purchases made by YOU.

Objections and Response to Request for Production No. 4:

Amazon refers to and incorporates by reference its General Objections, Objections to Definitions, and Objections to Instructions, as though fully set forth in this Response. Amazon further objects to this Request to the extent it purports to call for the production of documents that are not relevant to any party's claims or defenses, are not proportionate to the needs of the case, or are of such marginal relevance that their probative value is substantially outweighed by the burden imposed on Amazon in having to search for and provide such documents. Amazon further objects to this Request on the grounds that it is overly broad and unduly burdensome, by seeking "all" documents "evidencing" "any procurement policies, processes, or procedures" for LEASE TRANSACTIONS and land purchases. Amazon further objects to this Request to the extent that it calls for the production of documents or information protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or other applicable privileges, or for the production of confidential documents or information, including but not limited to the confidential information of other persons or entities.

Subject to and without waiving the foregoing objections, Amazon offers to meet and confer with Defendants' counsel to discuss a more reasonable scope for this Request and Amazon will conduct a reasonable search and produce responsive, non-privileged documents in its possession, custody, or control once a reasonable scope for this Request has been agreed upon.

Request for Production No. 5:

All DOCUMENTS RELATING TO all land purchases made by YOU for the use or benefit of AMAZON WEB SERVICES, INC. or any of its affiliates in Virginia, Maryland, or Delaware from 2014 to present, including but not limited to, (a) analyses of land prices in Virginia prepared by Amazon or third parties; (b) purchase and sale agreements between Amazon and any third